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VIA ECF

The Honorable John F. Keenan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: City of New York v. BP P.L.C., et al., 18-cv-182-JFK

Dear Judge Keenan:

I write as counsel for Chevron Corporation respectfully to inform the Court that a materially similar action has been filed against the Defendants by King County, Washington. The action was initially filed in the Superior Court of the State of Washington in and for King County, captioned as *King County v. BP P.L.C., et al.* (Case No. 18-2-11859-0), and subsequently removed by the Defendants to the United States District Court for the Western District of Washington (Case No. 18-cv-758). As here, the County purports to bring state common law claims for public nuisance and trespass based on alleged injuries potentially arising from the phenomena of global warming and climate change, including sea level rise and flooding. The County claims that the Defendants can be held liable for these and other alleged injuries based on their production, marketing, and sale of fossil fuels. The County demands an abatement fund to finance “the use of coastal armament to protect against sea level rise, and other resiliency measures to protect against global warming-induced injuries.”

A copy of the complaint in *King County* is attached hereto as Exhibit A.

Respectfully,

/s/ Anne Champion

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